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UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Lionel Shaw,

: Chapter 13

Debtor

: Case No. 23-12827-djb

CERTIFICATION OF DEFAULT

I, Stephen V. Bottiglieri, Esquire, attorney for Movant, Delaware County Tax Claim

Bureau, certify that Debtor has defaulted upon the terms of the Stipulation of Settlement of the

Motion for Relief regarding as 1218 Angora Avenue, Yeadon Borough, Delaware County,

Pennsylvania bearing folio number 48-00-00047-00 at Doc. 42 and approved by this Court on May

1, 2024 at Doc. 43.

It is further certified that the attached Notice dated March 14, 2025 was served upon

Debtor, the non-filing Co-Owner/Co-Debtor, and Debtor's Attorney on March 14, 2025.

Subsequent to said Notice, the Debtor and Co-Owner/Co-Debtor have failed to cure the default.

Accordingly, the Court shall enter the attached Order granting the Moving Party relief from the

Automatic Stay with a provision, as requested in the Motion for Relief, that no future bankruptcy

case filed within two years of the date of the Order will act as an automatic stay with regards to

the subject property as set forth in in the attached proposed order.

TOSCANI, STATHES & ZOELLER, LLC

Date: April 1, 2025

BY: /s/Stephen V. Bottiglieri

Stephen V. Bottiglieri, Esquire

Attorney for Delaware County Tax Claim Bureau

899 Cassatt Road, Suite 320

Berwyn, PA 19312

P 610-647-4901

sbottiglieri@tszlegal.com

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TOSCANI, STATHES & ZOELLER, LLC

ATTORNEYS AT LAW

THOMAS F. TOSCANI* MATTHEW G. BATHON+ NICHOLAS W. STATHES++ Andrew W. Zoeller** STEPHEN V. BOTTIGLIERI++ DANIEL P. WARD++ ROBERT A. AUCLAIR**

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Member PA & FL Bar

Member MD Bar

++ Member PA & NJ Bar

** Of Counsel; Member PA, NJ & DC Bar

March 14, 2025

VIA EMAIL ONLY

Brad J. Sadek, Esquire Sadek Law Offices, LLC 1500 JFK Blvd, Ste 220 Philadelphia, PA 19102

VIA FIRST-CLASS MAIL ONLY

Lionel C. Shaw 1218 Angora Drive Yeadon, PA 19050

RE: In re: Lionel C. Shaw, Chapter 13 Case No. 23-12827-djb 1218 Angora Avenue, Yeadon, Folio No.: 48-00-00014-00

Notice of Default of Stipulation of Settlement

Dear Mr. Sadek and Mr. Shaw:

This letter is a Notice of Default for failure to pay the 2024 real estate taxes due on 1218 Angora Avenue as required by the Stipulation of Settlement resolving the Delaware County Tax Claim Bureau's Motion for Relief in the above matter. A copy of the 2024 taxes are enclosed.

To cure this default, payment of \$5,627.12 must be received by the Delaware County Tax Claim Bureau on or before March 31, 2025. Payment by certified funds or money order should be remitted to:

> **Delaware County Tax Claim Bureau** Government Center Building 201 W. Front Street Media, PA 19063

If the required payment is not made, our office will certify the default with the Court as permitted by the Stipulation.

Thank you for your time and attention to this Notice of Default.

Very truly yours.

TOSCANI, STATHES & ZOELLER, LLC

Stephen V. Bottiglieri

Encl.

Stephanie Tindley (w/encl.) cc:

Delaware County Tax Claim Bureau

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DELAWARE COUNTY TAX CLAIM BUREAU ESTIMATED TAX STATEMENT

DT520PADEL Rev. 01/18

Delq Year: 2024

Type: ANNUAL

Cert:

Parcel No: 48-00-00047-00

Owner1 : TINDLEY STEPHANIE &

Owner2: SHAW LIONEL

Property Location: 1218 ANGORA AVE

Desc: 1 STY HSE/GAR

Date: 03/04/2025

Balance Due as of: 03/2025

DELINQUENT REAL ESTATE TAXES

		totamitt itmite mo	INIL IMMED		
		BILLING	PENALTY	INTEREST	TOTAL DUE
COUNTY	CHG	411.70	41.17	3.40	456.27
ASSMT: 130740	PAY/ADJ	0.00	0.00	0.00	0.00
	NET	411.70	41.17	3.40	456.27
SCHOOL	CHG	3,453,33	345.33	28,49	3,827.15
ASSMT 130740	PAY/ADJ	0.00	0.00	0.00	0.00
	NET	3,453.33	345.33	28.49	3,827.15
MUNICIPALITY	CHG	1,154.70	115.47	9.53	1,279,70
ASSMT: 130740	PAY/ADJ	0.00	0.00	0.00	0.00
	NET	1,154.70	115.47	9,53	1,279.70
COST	CHG	64.00	0.00	0.00	64.00
	PAY/ADJ	0.00	0.00	0.00	0.00
	NET	64.00	0.00	0.00	64.00
TOTAL	CHG	5,083.73	501.97	41,42	5,627,12
	PAY	0.00	0.00	0,00	0.00
	NET	5,083.73	501.97	41.42	5,627.12

L.B.F. 9014-4

UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Lionel C. Shaw : Chapter 13

:

Debtor : Bky. No. 23-12827-djb

* * * * * * *

CERTIFICATION OF SERVICE

I, <u>Stephen V. Bottiglieri</u>, certify that on <u>April 1, 2025</u>, I did cause a true and correct copy of the documents described below to be served on the parties listed on the mailing list exhibit, a copy of which is attached and incorporated as if fully set forth herein, by the means indicated and to all parties registered with the Clerk to receive electronic notice via the CM/ECF system:

Certification of Default

I certify under penalty of perjury that the above document(s) was sent using the mode of service indicated.

Date: 4/1/2025

Stephen V. Bottiglieri, Esq. No. 87343 Toscani, Stathes & Zoeller, LLC

899 Cassatt Road, Suite 320

Berwyn, PA 19312 (610) 647-4901

sbottiglieri@tszlegal.com

Mailing List Exhibit: (Check all that apply. If via e-mail, include e-mail address. Continue to the next page if necessary.)

Name: Lionel C. Shaw

Address: 1218 Angora Drive, Yeadon, PA 19050

Relationship of Party: Debtor

Via: CM/ECF X 1st Class Mail Certified Mail e-mail:

Other:

Name: Stephanie Tindley

Address: 1218 Angora Drive, Yeadon, PA 19050 Relationship of Party: Non-filing Co-Owner/Co-Debtor

Via: CM/ECF X 1st Class Mail Certified Mail e-mail:

Other:

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e-mail:

Name: Kenneth E. West, Esquire

Address: 190 N. Independence Mall West, Suite 701, Philadelphia, PA 19106

Relationship of Party: Chapter 13 Standing Trustee

Via: X CM/ECF 1st Class Mail Certified Mail

Other:

Name: Office of the United States Trustee

Address: Robert N.C. Nix Federal Building, 900 Market Street, Suite 320, Philadelphia, PA 19107

Relationship of Party: United States Trustee

Via: X CM/ECF 1st Class Mail Certified Mail e-mail:

Other:

Name:Brad J. Sadek, Esquire

Address: 1500 JFK Blvd, Ste 220, Philadelphia, PA 19102

Relationship of Party: Attorney for Debtor

Via: X CM/ECF 1st Class Mail Certified Mail e-mail:

Other:

Name Address

Relationship of Party

Via: CM/ECF 1st Class Mail Certified Mail e-mail:

Other:

Name Address

Relationship of Party

Via: CM/ECF 1st Class Mail Certified Mail e-mail:

Other: